

cc: Bernie (H)
aa: Lef

DAPHNE E. BARBEE 2911
Attorney & Counselor at Law
Century Square, Suite 1909
1188 Bishop Street
Honolulu, Hawaii 96813
Telephone: (808) 533-0275

Attorney for Plaintiff

ORIGINAL

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

APR 07 2008 *Aj*
at 3 o'clock and 40 min *P* M.
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RAYMOND WARE,

Plaintiff,

vs.

MICHAEL CHERTOFF, Secretary,
Department of Homeland Security;
JOHN DOES 2-5,

Defendants.

) CIVIL NO. 04-00671 HG/LEK
)
) **PLAINTIFF'S MOTION FOR**
) **ATTORNEY'S FEES AND**
) **RELATED NON-TAXABLE**
) **COSTS; DECLARATION OF**
) **COUNSEL; EXHIBITS 1-3;**
) **DECLARATION OF MICHAEL**
) **NAUYOKAS; EXHIBITS A-B;**
) **DECLARATION OF RONALD**
) **ALBU; EXHIBITS A-B;**
) **MEMORANDUM IN SUPPORT OF**
) **MOTION; CERTIFICATE OF**
) **SERVICE**
)
)
) TRIAL DATE: March 11, 2008
) JUDGMENT DATE: March 27, 2008
) JUDGE: Helen Gillmor

**PLAINTIFF'S MOTION FOR ATTORNEY'S
FEES AND RELATED NON-TAXABLE COSTS**

TO THE HONORABLE COURT:

COMES NOW, Raymond Ware ("Plaintiff"), Plaintiff in the above-captioned matter, by and through his attorney, DAPHNE E. BARBEE, pursuant to Local Rule 54.3, hereby moves for Attorneys' Fees and Related Non-taxable Expenses incurred by the firm of Daphne E. Barbee. The applicable judgment was filed on March 27, 2008. Title VII of the Civil Rights Act of 1964, as amended, provides that the prevailing party may be awarded reasonable attorneys' fees within the discretion of the Court. 42 U.S.C. § 2000e-5(k). The amount of Attorneys' Fees sought herein is \$134,652.05 and the amount of Related Non-taxable Expenses sought herein is \$1,651.06.

DATED: Honolulu, Hawaii 4-7-08.

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DAPHNE E. BARBEE
Attorney for Plaintiff